

REMARKS

In the Office Action, the Examiner rejected claims 27-32 and 37 under 35 U.S.C. §101 as non-statutory subject matter and rejected claims 20-38 under 35 U.S.C. §102(a) as anticipated by Andrew J. Mahwah, An Implementation of Secure Web Client Using SPKI/SDSI Certificates, Massachusetts Institute of Technology ("Mahwah").

Claims 20-38 are currently pending.

Applicants amended the specification to remove the description related to "program signal." As such, the rejection of claims 27-32 and 37 under 35 U.S.C. §101 should be withdrawn.

The Examiner rejected claims 20-38 under 35 U.S.C. §102(a) as anticipated by Mahwah. Applicants respectfully traverse this rejection.

Claim 20 recites a combination including, among other things, "upon receiving the first request, the server computer establishing a session by allocating a resource at the server computer, the resource including an identifier, and returning, in response to the first request, a predetermined close instruction to the browser at the client computer, the close instruction carrying the identifier identifying the session at the resource" and "upon unloading at the browser the predetermined close instruction received from the server computer, sending a second request from the client computer to the server computer to indicate initiation of the predetermined close instruction by the browser, the second request carrying the identifier and indicating to de-allocate the resource at the server computer."

In contrast to claim 20, Mahwah discloses the following:

- The client sends an HTTP¹ request (without credentials) to the Apache server.
- The web server sends a response to the user containing the acl in the body with Content-Type "application/x-spki-sdsi".
- The Netscape web browser then loads the plug-in into memory and creates a new instance. The plug-in will then retrieve the user's public and private keys.
- The plug-in generates a SPKI/SDSI tag specifying the permission that the client is requesting.
- Using the acl, tag, user's public key, and user's certificate cache, the plug-in generates a sequence of certificates using the SPKI/SDSI certificate chain discovery algorithm discussed in section 3.1.6.
- The plug-in signs the request tag, and sends the signature and certificate chain to the server to verify. A copy of the user's public-key is included in the signature.
- The server verifies the request by extracting the public-key from the signature, recreating the request's tag, verifying the signature using the key, and verifying that there is a valid authorization chain from an entry on the acl to the key via the certificate chain presented. Upon successful verification, the server returns the requested document to the client. The HTTP status code "200 OK" is used for this reply. If the verification fails, a server-side customizable error page is returned to the user. The HTTP status code "403 Forbidden" is used for this reply.

Mahwah, page 45. It is clear from the above excerpt that Mahwah fails to disclose a

predetermined close function provided by the server to the client, much less the “upon receiving” and “upon unloading” features recited in claim 20. Therefore, claim 20 and claims 21-26, at least by reason of their dependency from independent claim 20, are not anticipated by Mahwah, and the rejection of claims 20-26 under 35 U.S.C. § 102(a) should be withdrawn for this additional reason.

The Examiner alleges that Mahwah's “window.close” at page 55 discloses the following feature of claim 1 “upon receiving the first request, the server computer establishing a session by allocating a resource at the server computer, the resource including an identifier, and returning, in response to the first request, a predetermined close instruction to the browser, the close instruction carrying the identifier identifying the session at the resource.” Applicants disagree with the Examiner's allegation, and submit that a scrutiny of the cited passage reveals that Mahwah lacks the above-noted feature of claim 20. Instead, at page 55, Mahwah discloses “source code for the open_session_window function.” However, Mahwah's source code is related to a “plug-in” at the browser (rather than at the server). See page 52 (“plug-ins available at /usr/local/lib/netscape/plug-ins or /\$HOME/.netscape/plug-ins directory.”); see also page 54 (“plug-in checks to see if the session window has been started”); see also page 56 (“the plug-in displays a small “session window”); see also Figure 5-6 at page 57 (depicting the session window). At best, Mahwah discloses a “session window” presented by a browser and a plug-in, and a text message presented by the browser to remind the user to “close this window.” See Mahwah at Figure 5-6. As such, Mahwah's session window cannot possibly constitute the following feature of claim 20: “upon receiving the first request, the server computer establishing a session by allocating a resource at the server computer, the resource including an identifier, and returning, in

response to the first request, a predetermined close instruction to the browser, the close instruction carrying the identifier identifying the session at the resource." Therefore, claim 20 and claims 21-26, at least by reason of their dependency from independent claim 20, are not anticipated by Mahwah, and the rejection of claims 20-26 under 35 U.S.C. § 102(a) should be withdrawn for this additional reason.

The Examiner also alleges that Mahwah at page 52 discloses the following feature of claim 20: "upon unloading at the browser the predetermined close instruction received from the server computer, sending a second request from the client computer to the server computer to indicate initiation of the predetermined close instruction by the browser, the second request carrying the identifier and indicating to de-allocate the resource at the server computer," However, a careful scrutiny reveals that Mahwah at page 52 cannot possibly disclose a predetermined close instruction, much less "upon unloading at the browser the predetermined close instruction received from the server computer, sending a second request from the client computer to the server computer to indicate initiation of the predetermined close instruction by the browser, the second request carrying the identifier and indicating to de-allocate the resource at the server

3. **Instance Deletion.** A plug-in instance is deleted when a user leaves the instance's page, or closes the window. Netscape informs the plug-in instance that it will be deleted by calling the `NPP_Destroy` function. The plug-in can then free up allocated memory and close open files before being deleted.
4. **Shutdown.** When the last plug-in instance is deleted during a particular Netscape session, the plug-in code is unloaded from memory. Netscape calls the function `NPP_Shutdown` to alert the last plug-in. The plug-in can then free global resources accordingly.

computer," as recited in claim 20. Instead, Mahwah discloses the following:

Mahwah, page 52. In addition to lacking a predetermined close instruction

functionality, Mahwah also makes clear that it is the browser's plug-in that is closed and has its resources freed. In contrast, claim 20 expressly states that "upon unloading ... indicating to de-allocate the resources at the server computer." As such, Mahwah fails to disclose the "upon unloading" feature recited in claim 20. Therefore, claim 20 and claims 21-26, at least by reason of their dependency from independent claim 20, are not anticipated by Mahwah, and the rejection of claims 20-26 under 35 U.S.C. § 102(a) should be withdrawn for this additional reason.

Independent claims 27, 33, and 36-38, although of different scope, include features similar to those noted above for claim 20. For at least the reasons given with respect to claim 20, claims 27, 33, and 36-38 are not anticipated by Mahwah, and the rejection under 35 U.S.C. §102(a) of claims 27-33 and 36-38 as well as claims 28-32 and 34-35, at least by reason of their dependency from independent claims 27 and 33, should be withdrawn.

CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. No fee is believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-040-NATL/2000P00016WOUS01.

Respectfully submitted,

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/PFS/

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